

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al.*,¹

Debtors.

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Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Appellants Aspen American Insurance Company, Berkley Insurance Company and Sirius America Insurance Company (collectively “Appellants”), by and through their undersigned counsel, file this Notice of Appeal pursuant to 28 U.S.C. § 158(a)(1) and Rule 8003 of the Federal Rules of Bankruptcy Procedure.

Specifically, Appellants appeal to the United States District Court for the Southern District of Texas this Court’s Findings of Fact, Conclusions of Law, and Order Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Dkt. No. 1751], entered on June 25, 2021, (the “Confirmation Order”) to the extent the Confirmation Order, including any findings of fact or conclusions of law therein, authorizes (a) any assumption by the Debtor(s) and assignment to Credit Bid Purchaser(s)² of any leases or, (b) any sale of assets to

¹ The Debtors, each of which have filed a separate voluntary petition, are: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to those terms in the Confirmation Order [Dkt. No. 1751] and the Eighth Amended Joint Chapter 11 Plan [Dkt. No. 1731].

Credit Bid Purchaser(s), in each case free and clear of Appellants' future subrogation rights, pursuant to 11 U.S.C. §§ 363 or 365 or otherwise.

Part 1: Identification of Appellant

1. Name of Appellants - Aspen American Insurance Company, Berkley Insurance Company and Sirius America Insurance Company.

2. Position of Appellants in bankruptcy case - sureties of the Debtors.

Part 2: Identification of the Subject of this Appeal

1. The June 25, 2021 Confirmation Order to the extent the Confirmation Order, including any findings of fact or conclusions of law therein, authorizes (a) any assumption by the Debtor(s) and assignment to Credit Bid Purchaser(s) of any leases or, (b) any sale of assets to Credit Bid Purchaser(s), in each case free and clear of Appellants' future subrogation rights, pursuant to 11 U.S.C. §§ 363 or 365 or otherwise. The Confirmation Order is attached hereto as **Exhibit "A"**.

Part 3: Identification of the other Parties to the Appeal

The names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys are as follows:

1. Appellants: Aspen American Insurance Company, Berkley Insurance Company, and Sirius America Insurance Company

Attorneys for Appellants:

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2. Debtors: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

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3. Credit Bid Purchaser(s): Mako Buyer, LLC and Mako Buyer 2, LLC

Attorneys for Credit Bid Purchaser(s):

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Dated: June 30, 2021

Respectfully submitted,

HUSCH BLACKWELL LLP

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Notice of Appeal was served by electronic delivery on all persons and entities receiving ECF notice in this case on June 30, 2021.

/s/ Timothy A. Million

Timothy A. Million